MANATT, PHELPS & PHILLIPS, LLP L. Peter Parcher (LP 8096) O. Peter Sherwood (OPS 3076) Lisa Horwitz (LH 8168) 7 Times Square New York, New York 10036 Telephone: (212) 790-4500

And

EISENBERG & BOGAS, P.C. Sue Ellen Eisenberg Lucetta V. Franco 33 Bloomfield Hills Parkway, Suite 145 Bloomfield Hills, MI 48304 Attorneys for Defendant Isiah Thomas

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Anucha Browne Sanders,

٧.

Facsimile: (212) 790-4545

Plaintiff,

06 CV 0589 (GEL)(DCF)

Madison Square Garden, L.P., and Isiah Lord Sanders v. Madison Square Garden, L.P. et al

Defendant.

NOTICE OF MOTION FOR PRO HAC VICE ADMISSION OF LUCETTA V. FRANCO

PLEASE TAKE NOTICE that upon the annexed declaration of Lisa Horwitz and the Certificate of Good Standing annexed thereto, Defendant Isiah Thomas will move the Court before the Honorable Gerard E. Lynch at the United States Courthouse for the Southern District of New York, pursuant to Civil Rule 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an order granting *pro hac vice* admission of Lucetta V. Franco, a senior trial counsel of the law firm of Eisenberg & Bogas, P.C., and a member in good standing of the Bar of the State of Michigan.

Doc. 32

Dated: New York, New York

November 15, 2006

Respectfully submitted,

MANATT, PHELPS & PHILLIPS, LLP

L. Peter Parcher (LPP 8096)

O. Peter Sherwood (OPS 3076)

Lisa Horwitz (LH 8168)

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Attorneys for Defendant Isiah Thomas

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Anucha Browne Sanders,	
Plaintiff,	06 CV 0589 (GEL)(DCF)
V. Madison Square Garden, L.P., & Isiah Lord Thomas III., Defendant.	ORDER GRANTING MOTION FOR PRO HAC VICE ADMISSION OF LUCETTA V. FRANCO

ORDER FOR PRO HAC VICE ADMISSION OF LUCETTA V. FRANCO

This matter is before this Court on a motion for the pro hac vice admission of LUCETTA V. FRANCO as counsel for Defendant Isiah Thomas. The Court has considered the motion and is of the opinion, having reviewed the Notice of Motion for Pro Hac Vice Admission of Lucetta V. Franco, Esq., and the accompanying Declaration of Lisa Horwitz, Esq., that the Motion has merit and should be granted.

Accordingly, it is ORDERED that LUCETTA V. FRANCO is hereby permitted	to appear
pro hac vice as counsel for Defendant Isiah Thomas in this matter.	
IT IS SO ORDERED, this day of, 2006.	
Hon. Gerard E. Lynch United States District Court Southern District of New York	
80377543.1	

MANATT, PHELPS & PHILLIPS, LLP

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O. Peter Sherwood (OPS 3076)

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And

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Sue Ellen Eisenberg Lucetta V. Franco 33 Bloomfield Hills Parkway, Suite 145 Bloomfield Hills, MI 48304

Attorneys for Defendant Isiah Thomas

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Anucha Browne Sanders,

Plaintiff,

٧.

Madison Square Garden, L.P., Isiah Lord Thomas III, and James L. Dolan,

Defendants.

06 CV 0589 (GEL)(DCF)

DECLARATION OF LISA HORWITZ IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION OF LUCETTA V. FRANCO

I, LISA HORWITZ, hereby declare under penalty of perjury:

- 1. I am a member of the bar of the State of New York and of the Southern District of New York and am an attorney at Manatt, Phelps & Phillips, LLP, counsel for Defendant Isiah Thomas in the above-captioned matter. I submit this declaration in support of the application of Lucetta V. Franco for admission to the bar of this Court *pro hac vice*.
- 2. Ms. Franco is a senior trial counsel at the law firm of Eisenberg & Bogas, P.C., which is based in Bloomfield Hills, Michigan. She has practiced law for more than thirty years and is a highly regarded expert in fair employment practices law. Ms. Franco has served as a mediator, arbitrator and facilitator in employment cases and was a corporation counsel for Wayne County in Michigan. Ms. Franco is a member in good standing of the bar of the State of Michigan and is also admitted in the

United States District Courts for the Eastern and Western Districts of Michigan. Annexed hereto as Exhibit A is a certificate of good standing from the State Bar of Michigan for Ms. Franco. Ms. Franco's expertise in fair employment practices law makes her an invaluable member of the defense team.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on November 15, 2006.

Lisa Horwitz (LH \$168)

80376786.1



UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

		X	
Anucha Browne Sanders,)	06 CV 0589 (GEL)(DCF)
	Plaintiff,)	AFFIDAVIT OF MAIL SERVICE
- agains	t -)	
Madison Square Garden, L.P., III,	and Isiah Lord Thoma	s) (s) ()	
	Defendant.)))X	
		-)^	
STATE OF NEW YORK)		
	SS.:		
COUNTY OF NEW YORK)		

Nathaniel Howard, being duly sworn, deposes and says:

- 1. I am over 18 years of age and not a party to this action. I am employed by Manatt, Phelps & Phillips, LLP attorneys for Defendant Isiah Lord Thomas III.
- 2. On the 16th day of November, 2006, I served a true and complete copy of the Notice of Motion and Declaration of Lisa Horwitz in Support of Motion for Pro Hac Vice Admission by depositing said copy in a post office box regularly maintained by the United States Postal Service, in a securely-sealed, postage-paid envelope, addressed to plaintiff's counsel as listed below:

Ronald M. Green, Esq. (RG 7766)
Teresa M Holland (TH-6973)
Epstein Becker & Green, PC
Attorneys for Defendant Madison Square Garden, L.P.,
250 Park Avenue
New York, NY 10177-1211

Anne C. Vladeck, Esq. (AV 4857) Kevin T. Mintzer (KM 4741) Vladeck, Waldman, Elias & Engelhard, P.C. Attorneys for Plaintiff Anucha Browne Sanders

1501 Broadway, Suite 800 New York, New York 10036

Sworn to before me this Day of November 16, 2006?

SHARON A. BYRNE Notary Public, State of New Markiel Howard No. 01BY6028787

Qualified in Richmond County Term Expires August 2, 20